

Jewett White Lead Preferred Response Action

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to:

Kimberly Staiger

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Kim,

The New York State Department of Environmental Conservation (NYSDEC) has reviewed the proposed "non-time critical removal action" for the portion of the Jewett White Lead site located at 2000-2012 Richmond Terrace, in the Port Richmond section of the Borough Staten Island. The EPA's preferred alternative is to remove contaminated soils with lead concentrations greater than 800 ppm from the site. The NYSDEC is supportive of this alternative as it would remove more than 4000 cubic yards of lead-contaminated soil from the site and replace it with clean fill. Removal of the contaminated soil will prevent migration of lead from the site in the future and eliminate the need for additional monitoring and maintenance activities. Groundwater samples collected from the site indicate that lead has not impacted the groundwater making treatment unnecessary.

The NYSDEC expects that all removal activities will be conducted in a manner that prevents the migration of dust generated during the loading and transport phases of the removal process or by way of run-off caused by erosion of the site soils during precipitation events. A monitoring plan should be implemented and conducted during all ground-intrusive activities that would alert on-site personnel when an unacceptable level of dust is being generated and provides a contingency plan to take appropriate actions to prevent additional migration.

The NYSDEC appreciates the confirmation sampling protocol detailed in the proposed removal action that utilizes the existing investigation data as a starting delineation of the excavation area but then follows up with additional sidewall and bottom confirmation samples. If remedial action objectives have not been met, then additional soil will be removed until remaining lead in remaining soil is less than 800 ppm. DEC would also be appreciative if confirmation sampling data could be shared and reviewed by agency.

Please do not hesitate to contact me should you have questions regarding this email. A hard copy will follow in the mail.

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